

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

STARBRITE PROPERTIES CORP., Chapter 11 case no: 11-40758 (CEC)

Debtor.

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CUEVAS & GREENWALD, PC as Disbursing
Agent under STARBRITE PROPERTIES CORP.,
Debtor's Confirmed Plan of Reorganization,

Plaintiff, Adv. Pro. No: 12-1031 (CEC)

-against-

YOLANDE NICHOLSON, ESQ., CALIENTE
CAB RESTAURANT CO., INC., and
WILLIAM CORDERO,

Defendants.

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**RESPONSE OF YOLANDE NICHOLSON, ESQ., TO PLAINTIFF'S MOTION TO DEPOSIT
FUNDS WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT FOR THE
EASTERN DISTRICT OF NEW YORK**

Yolande Nicholson, Esq., and Yolande Nicholson P.C., files this Response to Carlos & Greenwald's ("C&G") Motion to Deposit Funds with the Clerk of the United States Bankruptcy Court for the Eastern District of New York (the "Motion") through her attorneys, The Law Office of Rachel S. Blumenfeld and respectfully states as follows:

1. On February 17, 2012, after days of negotiation, an agreement was reached between William Cordero, Caliente Cab Restaurant Co, Inc., and Yolande, Nicholson ("Defendants"), the parties competing for the \$72,550.59 being held in escrow ("the Funds"), by C&G, which resulted in a Stipulation and Order being signed by the Defendants prior to C&G filing this Motion. While C&G's signature was provided for

as “Disbursing Agent” on the Stipulation and Order, they were not in agreement with the terms and did not execute it.

2. It is respectfully requested that the Court either direct C&G to disburse the Funds to the parties in accordance with the executed Stipulation and Order, or in the alternative, permit C&G to deposit the Funds with the Clerk of the Court and direct the Clerk of the Court to disburse the Funds in accordance with the executed Stipulation and Order, and such other relief as this Court deems just and proper.

Dated: Brooklyn, New York
March 7, 2012

Respectfully submitted,

By: /s/ Rachel Blumenfeld
Rachel Blumenfeld (RB 1458)
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